

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT ILLINOIS
EASTERN DIVISION**

WINIFRED J. DAUGHERTY, *et al.*, on behalf
of themselves and a class,

Plaintiffs,

vs.

THE UNIVERSITY OF CHICAGO,

Defendant.

Civil Action No. 17-cv-03736

Hon. Ruben Castillo

**PLAINTIFFS' MOTION FOR AN ORDER:
FINALLY APPROVING CLASS ACTION SETTLEMENT;
APPROVING THE PLAN OF ALLOCATION;
APPROVING CASE CONTRIBUTION AWARDS TO PLAINTIFFS, AND
AWARDING ATTORNEYS' FEES AND COSTS**

Pursuant to Federal Rule of Civil Procedure 23(h), Plaintiffs Winifred J. Daugherty, Gloria Jackson and Walter R. James ("Plaintiffs"), by and through undersigned counsel, individually and on behalf of themselves and the Class, respectfully file this Motion for Final Approval of the Settlement, Approval of the Plan of Allocation, Approval of Case Contribution Awards to Plaintiffs, and an Award of Attorneys' Fees and Costs. This Motion is based on the accompanying Memorandum of Law, the Declaration of Eric Lechtzin, the Declaration of Todd M. Schneider, the Declaration of Mark R. Miller, the Declaration of Ronald A. Bertino, the Supplemental Declaration of Ronald A. Bertino, and all other records, pleadings and papers on file in this action. A proposed form of Order is attached.

DATED: August 15, 2018

s/Mark R. Miller

Kenneth A. Wexler

Mark R. Miller

WEXLER WALLACE LLP

55 West Monroe Street, Suite 3300

Chicago, Illinois 60603

Telephone: (312) 346-2222

Facsimile: (312) 346-0022

kaw@wexlerwallace.com

mrm@wexlerwallace.com

Todd S. Collins

Eric Lechtzin

Ellen T. Noteware

BERGER MONTAGUE PC

1818 Market Street, Suite 3600

Philadelphia, PA 19103-6365

Telephone: (215) 875-3000

Facsimile: (215) 875-4604

tcollins@bm.net

elechtzin@bm.net

enoteware@bm.net

John J. Nestico*

SCHNEIDER WALLACE COTTRELL

KONECKY WOTKYNS LLP

8501 N. Scottsdale Road, Suite 270

Scottsdale, Arizona 85253

Telephone: (480) 428-0145

Facsimile: (866) 505-8036

jnestico@schneiderwallace.com

Todd Schneider*

SCHNEIDER WALLACE COTTRELL

KONECKY WOTKYNS LLP

2000 Powell Street, Suite 1400

Emeryville, California 94608

Telephone: (415) 421-7100

Facsimile: (415) 421-7105

tschneider@schneiderwallace.com

Attorneys for Plaintiffs and the Class

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record via the Court's ECF system this 15th day of August, 2018.

s/Mark R. Miller
Mark R. Miller